



Federal Student Aid Policy and Procedures for Sending and Receiving Sensitive Documents and Media Using Land Shipment Methods

August 7, 2006

Background:

Due to a history of damaged/ripped packages shipped via private carriers and the US Mail, Federal Student Aid needs to implement immediate additional safeguards related to data exchanged between Federal Student Aid and our data exchange partners. The protection of the data entrusted to us is paramount and these measures are necessary to reduce the risk of information being lost or compromised.

Policy and Procedures:

1. All tapes that are "Returned Tapes" shall be degaussed or erased fully prior to shipping.
2. All sensitive documents and media shall be double packaged in opaque materials that are approved by the shipping agent. (DHL, FedEx, UPS, USPS, etc.)
3. To enforce the double packaging policy, the receiver may return an undamaged package if sent in a single package. **Damaged packages (single or double packages) shall not be returned.**
4. Both the "To" and "From" addresses shall be included on both the inner and outer packages.
5. Shipping agents shall have the capability of tracking the shipment's status.
6. Shipments shall require signatures upon receipt.
7. Packages shall not identify the sensitivity of the contents.
8. Shipments shall include a manifest inside the package. The receiver shall validate the package contents against the manifest: (1) Immediately upon receipt of a damaged package, or a package suspected of being compromised, and (2) within one business day of receipt for a package that does not fit within (1).
9. Manifests that include sensitive information that do not match contents of the package shall be immediately reported to the sender, the carrier, the System Security Officer (SSO) (see attached list of SSOs by system), Federal Student Aid's Computer Security Officer (CSO) (Robert Ingwalson (202) 377-3563), and the Department of Education's Incident Handling Coordinator (Eric Eskelsen (202) 245-6530). **The package should not be returned to the sender.** The receiving agent shall take appropriate actions including; begin an immediate search and initiate and update a report that identifies the timeline of events, routing points, individual names at each point that last touched the package, package contents, and other search actions using the attached form.
10. This policy shall be provided to all parties that send or receive sensitive Federal Student Aid documents or media. The SSOs shall deliver this policy to their contractors and to all alternate locations. The contractors and alternate locations are responsible for notifying those with whom they receive or ship sensitive documents or media. **This action shall be immediate.** The SSO shall notify the CSO when this policy is fully implemented for their system.
11. If any portion of this policy cannot be complied with by any party, that party shall notify the Federal Student Aid CSO via email (robert.ingwalson@ed.gov) identifying what cannot be complied with and why.

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Attachments: 1) System Security Officers 2) Reporting Template

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